

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN THE MATTER OF THE COMPLAINT
OF AET INC. LIMITED AS OWNER, AND
AET SHIPMANAGEMENT (SINGAPORE)
PTE. LTD AS MANAGER, OF THE M/T
EAGLE KINARUT, FOR EXONERATION
FROM OR LIMITATION OF LIABILITY

CIVIL ACTION NO. _____

ADMIRALTY RULE 9(h)

**DECLARATION OF CHRISTOPHER K. KINGHAM
REGARDING THE VALUE OF THE M/T EAGLE KINARUT**

This Declaration is presented pursuant to 28 U.S.C. § 1746, which provides for the admission of a declaration as proper evidence.

I, Christopher K. Kingham, declare as follows:

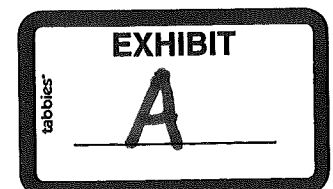
1. My name is Christopher K. Kingham. I am over twenty-one years of age, of sound mind and am competent to make this Declaration. I am currently a Fellow Member of the Institute of Chartered Shipbrokers and employed as a Ship Valuation Broker with E. A. Gibson Shipbrokers Ltd. As such, I am competent to make this declaration of value.
2. Attached hereto is a true and correct copy of a Valuation Certificate that I have prepared. On the basis stated in the attached Valuation Certificate, as of June 8, 2012, in my opinion the M/T "EAGLE KINARUT" had an approximate value of U.S. THIRTY-FIVE MILLION, FIVE HUNDRED THOUSAND DOLLARS (\$35,500,000.00).

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed on 22nd November 2012.



Christopher K. Kingham



GIBSON

SHIPPING ENERGY

AET UK Limited
Suite 8.02, Exchange Tower
1 Harbour Exchange Square
London
E14 9GE

For the attention of Alex Gordon

VALUATION CERTIFICATE

in respect of

.....
M.T. "EAGLE KINARUT"
.....

22nd November 2012

This certificate has been provided solely for the use of the person or company to whom it is addressed and no responsibility can be accepted to any other person or company

M.T. "EAGLE KINARUT"**VALUATION AS AT 8TH JUNE 2012**

Type	: Aframax Tanker
IMO No	: 9422201
Deadweight/Draft	: 107,481 dwt on 14.55m
Built/Yard	: 2011, Tsuneishi, Japan
Class	: Lloyds Register
Main Engine	: MAN B&W 6S60MC-C
LOA/Beam	: 243.8m loa x 42m beam
Capacity	: 126,500 cbm
Tanks	: 14 tanks (including 2 slops)
Pumps	: 3 x Centrifugal pumps
Additional Information:	: Modified epoxy coating and stainless steel coils

On the assumption that the vessel is in good working order and in a condition which is to be expected of a vessel of her age, size and type, we are of the considered opinion based on the information which has been obtainable, without sighting the vessel or her records, that the present day world-wide market value of this vessel, as described above, in sound seagoing condition, fully classed, undamaged, fully equipped and freely transferable on a charterfree basis, as between a willing seller and a willing buyer, was approximately:

US\$35,500,000.

(United States Dollars Thirty Five Million, Five hundred Thousand).

The above figure relates to our opinion of the market value as of 8th June 2012 and should not be taken to apply to any other date. No assurance can be given that such valuations can be sustained or are realisable in actual transactions.

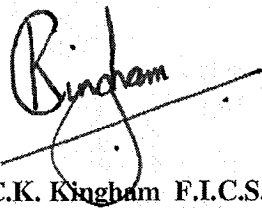
It is assumed that the vessel would be delivered on a prompt basis, within an acceptable area for cash payment on normal commercial sale terms.

It must be appreciated that the current financial turmoil has made the assessment of values uncertain. Information on comparable transactions and market demand has, where available, been very limited. These circumstances should be considered by anyone contemplating entering a transaction.

The valuation has been provided solely and exclusively for the use of the person to whom it is addressed and no responsibility can be accepted to any other person. This valuation is not to be distributed or circulated in any form without the prior written consent of E.A Gibson Shipbrokers Ltd. Furthermore this valuation is not to be used without their prior consent in any public offering in respect of shares or bonds etc., and we reserve the right to withhold such consent.

We believe that the valuation contained herein is reasonably accurate but it is a statement of opinion only and cannot be taken as a representation of fact. The vessels particulars have not been independently verified by us. Any person contemplating entering a transaction, should satisfy themselves, by inspection of the vessel and/or Classification Society records or otherwise, as to the correctness of the statements and assumptions which this document contains.

For & on behalf of
E.A. Gibson Shipbrokers Ltd.



C.K. Kingham F.I.C.S.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
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**IN THE MATTER OF THE COMPLAINT
OF AET INC. LIMITED AS OWNER, AND
AET SHIPMANAGEMENT (SINGAPORE)
PTE. LTD AS MANAGER, OF THE M/T
EAGLE KINARUT, FOR EXONERATION
FROM OR LIMITATION OF LIABILITY**

CIVIL ACTION NO. _____

ADMIRALTY RULE 9(h)

**DECLARATION OF RICHARD RUSSELL
REGARDING PENDING FREIGHT**

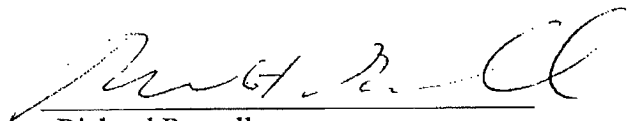
This Declaration is presented pursuant to 28 U.S.C. § 1746, which provides for the admission of a declaration as proper evidence.

I, Richard Russell, declare as follows:

1. My name is Richard Russell. I am over twenty-one years of age, of sound mind and am competent to make this Declaration. I am currently the Global Head of Crude Operations of limitation plaintiff AET Inc. Limited. As such, I have first-hand knowledge of the facts stated in this Declaration.
2. At all material times, AET Inc. Limited is and was the owner of the M/T EAGLE KINARUT, which was allegedly involved in an allision with the ExxonMobil-Baytown Facility Dock No. 6 located in Baytown, Texas on June 8, 2012. The alleged allision is the subject of a Complaint for Exoneration From or Limitation of Liability to be filed in the United States District Court for the Southern District of Texas, Houston Division.
3. At the time of the alleged allision, the contractual value of the services the M/T EAGLE KINARUT was performing under a Ship-to-Ship Transfer Contract dated September 1, 2011 between AET Inc. Limited and SeaRiver Maritime, Inc. was \$469,324.21.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on November 30, 2012.


Richard Russell

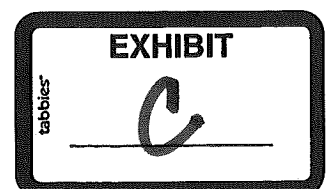


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN THE MATTER OF THE COMPLAINT	§	
OF AET INC. LIMITED AS OWNER, AND	§	
AET SHIPMANAGEMENT (SINGAPORE)	§	CIVIL ACTION NO. 12-3530
PTE. LTD AS MANAGER, OF THE M/T	§	
EAGLE KINARUT, FOR EXONERATION	§	ADMIRALTY RULE 9(h)
FROM OR LIMITATION OF LIABILITY	§	

**NOTICE TO CLAIMANTS OF COMPLAINT
FOR EXONERATION FROM OR LIMITATION OF LIABILITY**

COME NOW AET Inc. Limited as owner, and AET Shipmanagement (Singapore) Pte. Ltd as manager of the M/T EAGLE KINARUT (the "Vessel"), in a cause of action for exoneration from or limitation of liability pursuant to 46 U.S.C. § 30501 *et. seq.*, and respectfully submit the following Notice for publication in The Baytown Sun, as ordered by this Court and pursuant to Rule F of the Supplemental Rules for Certain Admiralty & Maritime Claims:



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN THE MATTER OF THE COMPLAINT OF AET INC. LIMITED AS OWNER, AND AET SHIPMANAGEMENT (SINGAPORE) PTE. LTD AS MANAGER, OF THE M/T EAGLE KINARUT, FOR EXONERATION FROM OR LIMITATION OF LIABILITY	§ § § § § §	CIVIL ACTION NO. 12-3530 ADMIRALTY RULE 9(h)
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**NOTICE OF ACTION BROUGHT FOR
EXONERATION FROM OR LIMITATION OF LIABILITY**

NOTICE IS HEREBY GIVEN that AET Inc. Limited as owner, and AET Shipmanagement (Singapore) Pte. Ltd as manager (hereafter collectively referred to as "Limitation Plaintiffs"), of the M/T EAGLE KINARUT its engines, gear, tackle, etc., have filed a Verified Complaint pursuant to Title 46 of the Revised Statutes of the United States, 46 U.S.C. §§ 30501, *et. seq.*, inclusive, claiming the right to exoneration from or limitation of liability for all claims for any loss of life, personal injury, destruction, damage, loss, or environmental damage resulting from or arising during an STS (Ship-to-Shore) transfer operation for the lightering of cargo of Basrah crude by the M/T EAGLE KINARUT from the M/T PU TUO SAN for discharge at the ExxonMobile-Baytown Facility, Dock No. 6, which took place on or about June 8, 2012, as is more fully described in Limitation Plaintiffs' Verified Complaint For Exoneration From or Limitation of Liability.

All persons having such claims must file them under oath, as provided in Rule F(4) of the Supplemental Rules for Admiralty or Maritime Claims & Asset Forfeiture Actions to the Federal Rules of Civil Procedure (the "Supplemental Rules") with the Clerk of this Court on or before 10:00 a.m. on the ____ day of _____, 2013, at the United States Courthouse at Houston, Texas, and serve on or mail a copy to the attorney for the Limitation Plaintiffs, James P. Cooney, Royston, Rayzor, Vickery & Williams LLP, 711 Louisiana Street, Suite 500, Houston, Texas 77002, or be forever defaulted, in accordance with the provisions of Rule F of the Supplemental Rules. Personal attendance is not required.

Any claimant desiring to contest the claims of the Petitioner must file an answer to the said Verified Complaint For Exoneration From or Limitation of Liability, as required by Rule F(5) of the Supplemental Rules, and serve on or mail a copy to the attorney for the Limitation Plaintiffs.

SIGNED at Houston, Texas this ____ day of December, 2012.

By: _____
CLERK OF COURT

Respectfully submitted,

By: /s/ James Patrick Cooney
James Patrick Cooney
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**ATTORNEYS FOR LIMITATION
PLAINTIFFS AET INC. LIMITED and AET
SHIPMANAGEMENT (SINGAPORE) PTE.
LTD**

OF COUNSEL:

ROYSTON, RAYZOR, VICKERY & WILLIAMS, L.L.P.